

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GARRISON REDD,

Plaintiff,

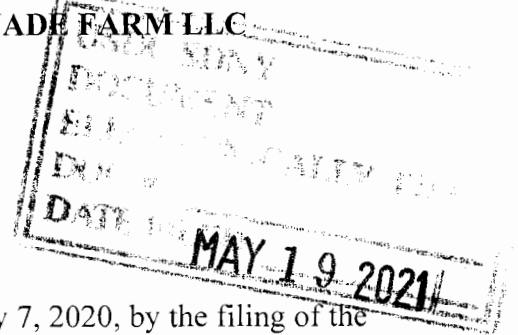
-against-

MANSION REALTY LLC AND THE JADE FARM
LLC

Defendants.
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Docket: 1:20-cv-00129 (GBD)(SDA)

~~PROPOSED~~ DEFAULT JUDGMENT
AGAINST DEFENDANTS
MANSION REALTY LLC AND THE
JADE FARM LLC



THIS ACTION, having been commenced on January 7, 2020, by the filing of the Summons and Complaint, and a copy of the Summons and Complaint having been served on Defendants, Mansion Realty LLC and The Jade Farm LLC ("Defendants"), on January 9, 2020, and proof of such service having been filed on February 26, 2020, and the Defendants having failed to answer or otherwise respond to the Complaint as required by law, and the time to answer or otherwise respond to the Complaint having expired, it is hereby

ORDERED and ADJUDGED, as follows:

1. That Plaintiff has Judgment against Defendants Mansion Realty LLC and The Jade Farm LLC, to correct the following architectural barriers and violations of the Americans with Disabilities Act ("ADA") within sixty (60) days (the "Remediation Order") at the facility commonly referred to as Jue Lan Club, located at 49 West 20th Street, New York, New York 10011 (hereinafter the "Subject Facility"):

- I. There is no wheelchair accessible route from the public sidewalk to the building entrance because of steps that have a change in level greater than ½ inch high.

- II.** The exterior (vestibule) door does not provide 32 inches of clear opening width.
- III.** The exterior (vestibule) door lacks level maneuvering clearances for a wheelchair user at the pull side of the door due to a step.
- IV.** There is less than 48 inches between the two doors in a series at the public entrance vestibule.
- V.** There is no room for a wheelchair turning space between the two doors in a series at the public entrance vestibule.
- VI.** There is no wheelchair accessible route from the exterior side of the interior (vestibule) door to the interior.
- VII.** The interior (vestibule) door lacks level maneuvering clearances for a wheelchair user at the pull side of the door due to steps.
- VIII.** The interior (vestibule) door lacks at least one leaf at double leaf doors with at least 32 inches of clear opening width.
- IX.** The interior (vestibule) door lacks maneuvering clearances for a wheelchair user at the push side of the door.
- X.** A wheelchair accessible route is not provided between the first level front dining room and the first level rear dining room due to a step.
- XI.** A wheelchair accessible route is not provided between the ground level and the second level due to steps.
- XII.** A wheelchair accessible route is not provided between the ground level and exterior dining area due to a step.
- XIII.** The ramp at the Graffiti Room lacks handrails on both sides of the ramp.
- XIV.** The ramp at the Graffiti Room lacks handrail extensions.
- XV.** The ramp at the Graffiti Room lacks wheelchair accessible top and bottom landings.
- XVI.** The doorway from the Graffiti Room lacks level maneuvering clearances for a wheelchair user at the push side of the door due to sloping at the ramp.

- XVII.** The doorway to the Graffiti Room lacks maneuvering clearances for a wheelchair user at the pull side of the door due to the width of the corridor leading to the room.
- XVIII.** The doorway to the Forbidden Room lacks level maneuvering clearances for a wheelchair user at the pull side of the door due to steps.
- XIX.** There is no wheelchair accessible seating at the first level bar and no wheelchair accessible tables are provided in the surrounding first level front dining room.
- XX.** There are no wheelchair accessible tables in the first level front dining room.
- XXI.** There are no wheelchair accessible tables in the first level rear dining room.
- XXII.** There are no wheelchair accessible tables in the Graffiti Room.
- XXIII.** There are no wheelchair accessible seating at the second level bar (the Warhol Room). And no wheelchair accessible tables are provided in the surrounding second level dining room (the Warhol Room).
- XXIV.** There are no wheelchair accessible tables in the Warhol Room.
- XXV.** There are no wheelchair accessible tables in the Forbidden Room.
- XXVI.** The men's toilet room is not accessible.
- XXVII.** The men's toilet room lacks a wheelchair accessible water closet.
- XXVIII.** The toilet compartment at the men's toilet room lacks a wheelchair accessible water closet.
- XXIX.** The water closet in toilet compartment at the men's toilet room is located more than 18" from the side wall.
- XXX.** The water closet in the toilet compartment at the men's toilet room lacks compliant grab bars.
- XXXI.** The water closet in toilet compartment at the men's toilet room has the toilet paper dispenser in the incorrect location.
- XXXII.** The coat hook on the door of the toilet compartment at the men's toilet room is outside of a wheelchair accessible reach range.

- XXXIII.** The men's toilet room lacks a wheelchair accessible lavatory.
- XXXIV.** The low lavatory at the men's toilet room lacks a clear floor space for a forward approach to the fixture due to a plant.
- XXXV.** The low lavatory at the men's toilet room lack protected hot water and drainpipes.
- XL.** The men's toilet room lacks a wheelchair accessible mirror.
- XLI.** The men's toilet room lacks a wheelchair accessible urinal.
- XLII.** All three (3) urinals at the men's toilet room have rims that are more than 17 inches above the finish floor.

2. That the Subject Facility, located at 49 West 20th Street, New York, New York, 10011, which is currently leased, owned, and operated by Defendants Mansion Realty LLC and The Jade Farm LLC, shall be closed to the general public with all business operations ceased until Defendants fully comply with the terms of this Order.

3. That within sixty (60) days after entry of this Judgment, Defendants shall serve and file with this Court notice and evidence of its compliance with the terms hereof.

4. That the Court reserves jurisdiction to enforce the terms of this Judgment as set forth above, and upon full compliance by Defendants of the foregoing to hold such further proceedings as necessary to affix and award Plaintiff's damages, as well as, his attorney's fees, costs, and expenses incurred through the date of Defendants' full compliance.

Dated: **MAY 19 2021**
New York, New York

SO ORDERED.


GEORGE B. DANIELS, U.S.D.J.